7.0 OTHER CEQA AND ENVIRONMENTAL CONSIDERATIONS

7.1 GROWTH INDUCING IMPACTS

Section 15126.2(d) of the *CEQA Guidelines* requires that an EIR "*discuss the ways in which the project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the environment surrounding a proposed project. Included in this are projects which would remove obstacles to population growth*." In general terms, a project may result in a growth inducing impact if it individually or cumulatively results in any of the actions described in the following examples:

- The project removes an obstacle to growth, such as: the establishment of an essential public service, the provision of new access to an area, or a change in zoning or general plan designation.

- The project results in economic expansion, population growth or the construction of additional housing occurs in the surrounding environment in response to the project, either directly or indirectly.

The Valle Verde project would not result in the extension or expansion of public services (i.e., water, sewer lines and roads) as these types of infrastructure systems have previously been installed on and adjacent to the project site to serve existing development, including development on the Valle Verde Campus. The development of the proposed residential units, accessory structures and other resident-serving uses has been proposed in response to existing demands for housing, and the project would be located on a developed site. The proposed project would add 40 new dwelling units for approximately 60 additional residents on the project site. Therefore, the project would not result in substantial population growth in the project area and would not result in a significant growth inducing impact.

7.2 SUSTAINABLE DEVELOPMENT EVALUATION

This section provides a brief overview of general "sustainable development" principles and provides an evaluation of the Valle Verde project's consistency with a variety of programs and concepts that promote sustainable development. An evaluation of how development projects have or have not implemented sustainable development principles is not a CEQA requirement, and no standards for evaluating projects have been adopted by the City. The purpose of this analysis is to provide a description of the proposed project's consistency with sustainable development principles to provide additional information about the project and to promote informed decision-making.

7.2.1 Background Information

Sustainable Development Concepts. The concept of sustainable development refers to a variety of growth-related principles and practices that communities can implement to benefit

the local environment and quality of life. In general, sustainable development integrates environmental, social and economic factors to promote the efficient use of resources, the development and use of effective infrastructure systems, and to create businesses to strengthen local economies. In terms of environmental sustainability, one of the major objectives of sustainable development is to use renewable resources at a rate that is equal to or less than nature's ability to replenish those resources. The responsible use of energy is another key objective of sustainable development. By implementing sustainable development principles in the planning and development of communities and individual projects, negative aspects of growth, such as traffic congestion, sprawl, pollution and the inefficient use of resources can be minimized or avoided.

City-Sponsored Programs. The City of Santa Barbara has implemented a variety of programs to promote sustainable development. These programs are primarily related to activities conducted by the City and are intended to minimize environmental and global climate change impacts by promoting energy conservation, limiting waste generation, and protecting natural resources. As described on the City's *Sustainable Santa Barbara* website,[1] sustainability programs established by the City include:

Waste Prevention Programs

- Solid Waste Strategic Planning
- Electronic waste management
- Hazardous materials management
- Construction and demolition waste recycling
- Recycling
- Green waste
- Furniture, appliances and building wastes

Water Quality, Conservation and Habitat Restoration

- Water resources conservation
- Creeks and coastal ocean water quality
- Wastewater treatment
- Reclaimed water use

Energy Management

- Renewable energy
- Green building practices
- Solar energy systems
- Alternative transportation

[1] http://www.santabarbaraca.gov/Government/SustainableSB/index.htm

7.2.2 Project-Related Sustainability Evaluation

The Valle Verde project's consistency with sustainable development objectives has been evaluated in this EIR based on the proposed project's general energy use characteristics, and the project's implementation of "smart growth" principles. Project-related energy use has been evaluated in a qualitative manner using applicable criteria provided by *CEQA Guidelines* Appendix F (Energy Conservation) and the City's Energy Ordinance. The project's compliance with smart growth principles has been qualitatively evaluated using criteria provided by the Leadership in Energy and Environmental Design – Neighborhood Design (LEED-ND) rating system. Additional information regarding these programs is provided below.

Energy Use Background Information

Regional Energy Supplies. Southern California Edison (SCE) provides electrical energy in Santa Barbara, and gas supplies are provided by the Southern California Gas Company. The Valle Verde project site is located in an urbanized area and existing electrical and gas delivery lines are located on and adjacent to the project site.

During the restructuring of California's electric industry in the late 1990's, SCE sold most of its generating facilities, retaining only its hydropower, coal and nuclear power generating plants. SCE indicates that approximately 17 percent of the energy they provide comes from renewable resources such as wind, solar, biomass (solids such as agricultural and wood waste), small hydropower, biogas (landfills and sewage digesters) and geothermal resources.

The Gas Company obtains gas resources from a variety of sources located in California, outside of the state, and offshore facilities. Approximately 30 to 40 percent of the gas that flows through the company's pipeline system is purchased by the Gas Company for residential and small commercial and industrial customers. The remaining 60-70 percent of the gas is purchased and owned by gas marketers and very large uses, such as power plants and large manufacturing facilities.

Legislative Requirements. There are numerous legislative requirements that pertain to the production, transportation and use of energy resources. State and City requirements that are directly related to the evaluation of the Valle Verde projects' consistency with City of Santa Barbara energy use and sustainability objectives are briefly described below.

Title 24. California Code of Regulations Title 24, Part 6, also known as the California Building Energy Efficiency Standards, contains energy conservation standards applicable to all residential and non-residential building in California. These energy efficiency standards were established in 1978 to reduce energy consumption. The standards are updated periodically to incorporate new energy efficiency technologies and methods. Recent revisions to the California Energy Efficiency Standards went into effect January 1, 2010.

CEQA Requirements. *CEQA Guidelines* Appendix F indicates that the goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:

- Decreasing overall per capita energy consumption,
- Decreasing reliance on natural gas and oil, and
- Increasing reliance on renewable energy resources.

Appendix F also states that the emphasis of a review of a proposed project's energy use should be on "avoiding or reducing inefficient, wasteful and unnecessary consumption of energy."

7.2.3 Energy Use Evaluation Criteria

As described by *CEQA Guidelines* Appendix F, the Valle Verde project would be consistent with the City's sustainability objectives related to energy use if it would not use energy in an inefficient, wasteful or unnecessary manner.

Project-Related Energy Use Evaluation

Existing Energy Use. Energy use by existing Valle Verde facilities is primarily for domestic purposes, operation and maintenance of accessory facilities, and resident transportation. Valle Verde has implemented a variety of measures to reduce energy use, including:

- The installation of photo-voltaic panels that can produce up to 42 kilowatts of electricity.
- The Assisted Living and Memory Support facilities are served by solar-heated water and solar space heating.
- Residential units are remodeled using Built Green practices.
- Use of high-efficiency recirculation water pumps with timers that shut off at night.
- Installation of solar tubes, sky lights, and high-performance windows.
- Whenever possible, remodeled residences are deconstructed and recovered lumber is used on campus.
- Electric vehicles are used by staff on campus.
- The campus purchases 85 percent of its produce from local farms and has reduced food deliveries to save fuel and truck trip miles.

Short-Term Energy Use. Short-term energy use by the Valle Verde project would result primarily from the use of construction equipment. Construction operations would occur over a period of approximately 18 months, however, the most intensive equipment use would be associated with site/foundation preparation activities. The project would result in approximately

11,520 cubic yards of cut and 13,300 cubic yards of fill, for a total grading volume of 24,820 cubic yards. Approximately 1,780 cubic yards of soil would be imported to the site, requiring approximately 90 truck trips (180 one-way trips).

Several mitigation measures recommended by the Initial Study prepared for the Valle Verde project would minimize energy use by project-related construction equipment. The recommended mitigation measures would require the efficient use of equipment on the project site; require that construction equipment be maintained in good working order; require to the extent feasible the use of biodiesel, which would increase the project's use of renewable energy sources; and limit equipment idling and associated energy use. A recommended mitigation measure would also provide indirect energy savings by requiring that construction and demolition waste be recycled.

Based on the proposed project's construction characteristics and the recommended mitigation measures described above, the construction operations required for the Valle Verde project would not use energy in an inefficient, wasteful or unnecessary manner. Therefore, the proposed project would be consistent with the City's sustainable development objectives related to the short-term use of energy.

Long-Term Energy Use. Long-term energy use by the Valle Verde project would result primarily from stationary sources such as space and water heating equipment, and mobile sources such as vehicle trips by project residents.

Stationary Sources. The long-term energy demand of the Valle Verde project cannot be calculated until the final building plans have been developed. Although the project's energy use requirements cannot be accurately estimated at this time, the project would be required to comply with the current energy use requirements of the Building Code. It is anticipated that compliance with the Energy Ordinance requirements would be achieved with the implementation of increased minimum energy efficient construction standards, energy savings through the use of Energy Star rated appliances, and increased mechanical system efficiency ratings.

Mobile Sources. It is estimated that the Valle Verde project would generate approximately 98 vehicle trips per day. Vehicle trips generated by project residents may be lower than projected levels because the Valle Verde facility currently provides, and has proposed to provide, a variety of on-campus facilities and that would reduce the need for off-site vehicle trips. These types of uses include recreation facilities, a limited-service bank branch, dining opportunities, beauty salon and medical services. In addition, an MTD bus stop is located on the project site, and Valle Verde operates a shuttle service for residents. By providing on-site resident-serving facilities and transit service capabilities, vehicle trip miles required to obtain services would be reduced resulting in a corresponding reduction in energy use.

Overall Energy Use. Compliance with state and local energy use regulatory requirements, and the continued use of on-site photo-voltaic and solar heating systems, would ensure that the Valle Verde project is consistent with the City's sustainable development

objectives related to the long-term use of energy. Energy savings would also be realized by incorporating building design features similar to those described above into the design of proposed buildings. By providing resident-serving facilities on the project site, as well as transit services designed to meet the needs of residents, vehicle dependence by project residents would be reduced, which would result in energy saving benefits. Based on the proposed project's design characteristics, it can be reasonably concluded that the Valle Verde project would not use energy in an inefficient, wasteful or unnecessary manner. Therefore, the proposed project would be consistent with the City's sustainable development objectives related to the long-term use of energy.

7.2.5 Smart Growth Evaluation

Smart Growth Background Information

Smart Growth Principles. In general, smart growth invests time, attention, and resources in restoring communities and vitality to city centers and older suburbs. New smart growth is more town-centered, is transit and pedestrian oriented, and has a greater mix of housing, commercial and retail uses. It also preserves open space and many other environmental amenities. [2]

The ten smart growth principles listed below describe the various planning- and development-related characteristics that are generally associated with smart growth projects:[3]

- Create a range of housing opportunities and choices
- Create walkable neighborhoods
- Encourage community and stakeholder collaborations
- Foster distinctive, attractive communities with a strong sense of place
- Make development decisions predictable, fair and cost effective
- Mix land uses
- Preserve open space, farmland, natural beauty and critical environmental areas
- Provide a variety of transportation choices
- Strengthen and direct development towards existing communities
- Take advantage of compact building design

LEED-ND Rating System. The LEED-ND rating system integrates the principles of smart growth, new urbanism and green building practices. It is the intent of the LEED-ND program to provide a mechanism that allows third-party verification that a development's location and design meets specified environmental protection and sustainability objectives. Developed by the U.S. Green Building Council, the Congress for the New Urbanism, and the Natural Resources Defense Council, the rating system is similar to the LEED-NC (New

[2] Smart Growth Network, About Smart Growth, www.smartgrowth.org/about/default.asp
[3] *ibid*.

Construction) program, which is used to evaluate individual buildings. The smart growth principles that are emphasized by the LEED-ND evaluation criteria include:

Smart Location & Linkage. Project location criteria emphasize the conversion of existing urban lots rather than the development of open space, agricultural land or areas with biological resources. Project sites with easy access to urban services and public transit are also encouraged.

Neighborhood Pattern & Design. Land use evaluation criteria encourage the conservation of land through compact development that has access to public parks and other open spaces.

Green Infrastructure and Buildings. These criteria generally promote energy, water and natural resource conservation. Conservation-related evaluation criteria are intended to encourage energy efficient building design and construction, reductions in water use, and to minimize construction-related impacts.

Projects are evaluated using the LEED-ND rating system by determining that the development meets certain prerequisite criteria, and then by assigning a range of "credits" prescribed for the various evaluation criteria. Based on the point total earned, development projects may be "certified" or awarded silver, gold or platinum ratings.

Project-Related Smart Growth Evaluation Criteria

The LEED-ND evaluation program has been developed primarily to evaluate large-scale residential and non-residential development projects. Due to the campus or neighborhood design theme of the Valle Verde facility, many of the LEED-ND evaluation criteria are applicable to the proposed project. A preliminary evaluation of the Valle Verde project's consistency with applicable LEED-ND rating criteria is provided on Table 7.2-1. The consistency review has been conducted by evaluating how the proposed project's design implements LEED-ND "Smart Location & Linkage" and "Neighborhood Pattern & Design" criteria. Many of the LEED-ND "Green Infrastructure and Buildings" criteria relate to items such as building material selection, construction methods, and project-related energy use. Since proposed project plans have been developed at a planning-level of detail (i.e., construction drawings have not yet been prepared), an evaluation of the project's consistency with the "Green Infrastructure and Buildings" criteria was not included in this evaluation. For the purpose of this review, the proposed project would be considered consistent with City' sustainability objectives if it would generally implement the applicable LEED-ND evaluation criteria.

Project-Related Smart Growth Evaluation

The LEED-ND consistency evaluation provided on Table 7.2-1 reviews the project's general implementation of applicable rating criteria, and does not assign the credit points allocated to each criterion. Although credit points are not assigned, the possible range of credit points that may be earned is included on the Table to indicate the relative importance of each

criterion. The criterion "Requirements" column provided on the Table summarizes the directions provided by the LEED-ND program to reflect the requirements most applicable to the proposed project.

Table 7.2-1
Valle Verde Retirement Community Project
LEED 2009 for Neighborhood Development (ND)
Consistency Evaluation

Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
Smart Location & Linkage				
Prerequisite 1: Smart Location	na	Encourage development within and near existing communities or public transportation infrastructure. Reduce vehicle trips and miles traveled and support walking as a transportation choice.	Locate the project on a site served by existing water and waste water infrastructure; and Locate the project on an infill site.	**Criterion Implemented.** The proposed project would integrate new residential units into the existing Valle Verde facility, and residential neighborhoods are located adjacent to the campus to the east and southwest. Therefore, the proposed project would result in infill development. The Valle Verde campus is presently served by water and waste water infrastructure.
Prerequisite 2: Imperiled Species and Ecological Communities	na	Protect imperiled species and ecological communities.	Determine if species listed under the federal Endangered Species Act or the state's Endangered Species Act have been found on the site or have a high likelihood of occurring on the site. If no such species have been found or have a high likelihood of being present, the prerequisite is achieved.	**Criterion Implemented.** There are no listed Federal or State listed species known to exist on the project site, and habitat does not exist on the site to support listed species that occur in the project region.
Prerequisite 3: Wetland and Water Body Conservation	na	Preserve water quality, natural hydrology and habitat and preserve biodiversity through conservation of water bodies or wetlands.	Locate the project on a site that includes no wetlands, water bodies, or land within 50 feet of wetlands and 100 feet of water bodies.	**Criterion Implemented.** There are no wetland habitat areas on the project site. The Valle Verde facility is west of Arroyo Burro Creek and all proposed development would be at least 100 feet from the creek channel.

Table 7.2-1
Valle Verde Retirement Community Project
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Consistency Evaluation

Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
Prerequisite 4: Agricultural Land Conservation	na	Preserve irreplaceable agricultural resources by protecting prime and unique farmland and forest lands from development.	Locate the project on an infill site.	**Criterion Implemented.** The proposed project would integrate new residential units into the existing Valle Verde facility, and residential neighborhoods are located adjacent to the campus to the east and southwest. Therefore, the proposed project would result in infill development. The Valle Verde campus is presently served by water and waste water infrastructure.
Prerequisite 5: Floodplain Avoidance	na	Protect life and property, promote open space and habitat conservation, and enhance water quality and natural hydrological systems.	Locate the project on a site that does not contain any land within a 100-year floodplain.	**Criterion Implemented.** The project site is not located in a flood hazard zone.
Credit 1: Preferred Locations	1 to 10 Points	Encourage development within existing communities to reduce the effects of urban sprawl. Reduce development pressure beyond the limits of existing development. Conserve natural and financial resources required for construction and maintenance of infrastructure.	Locate the project in one of the following locations: • An infill site that is also a previously developed site (5 points) • An infill site that is not a previously developed site (3 points) • An adjacent site that is also a previously developed site (2 points) • A previously developed site that is not an adjacent or infill site (1 point)	**Criterion Implemented.** The proposed project would be located on an infill site, and most of the Valle Verde project site has been extensively developed. New residences proposed for the Rutherford parcel would be located on a site that has been minimally developed, however, residential development is located west of and adjacent to this portion of the project site.

Table 7.2-1
Valle Verde Retirement Community Project
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
Credit 2: Brownfields Redevelopment	1 to 2 Points	Encourage the reuse of land by developing sites were development is complicated by environmental contamination, reducing pressure on undeveloped land.	Locate the project on a site, part or all of which is documented as contaminated OR on a site defined as a brownfield by a local, state or federal government agency; and remediate site contamination such that the controlling public authority approves the protective measures and/or clean-up as effective, safe and appropriate for the future use of the site.	**Criterion Not Met/Not Applicable.** There is no known contamination on the project site and it is an objective of the project to expand the campus on the existing project site. Implementation of this criterion is not applicable to the proposed project.
Credit 3: Reduced Automobile Dependence	1 to 7 Points	Encourage development in locations shown to have multi-modal transportation choices or otherwise reduced motor vehicle use.	Locate the project on a site with existing transit service such that at least 50% of the dwelling units are within a ¼ mile walk distance of a bus stop.	**Criterion Implemented.** An MDT bus stop is presently located on the project site.
Credit 4: Bicycle Network and Storage	1 Point	Promote bicycling and transportation efficiency.	Design or locate the project such that an existing bicycle network of at least five continuous miles in length is within ¼ mile bicycling distance of the project boundary. Provide at least one secure, enclosed bicycle storage space per occupant for 30% of the planned occupancy but no fewer than one per unit. Provide secure visitor bicycle racks on-site, with at least one bicycle space per 10	**Criterion Partially Implemented.** The project site is located approximately ½ mile south of Modoc Road and the Class II Cross Town bike route. This bike path provides a connection to the bicycle path network that extends throughout the project region. **Criterion may be Implemented.** The proposed site plan does not include bike parking facilities, however, adequate area exists to provide bike parking facilities for residents and employees.

Table 7.2-1
Valle Verde Retirement Community Project
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
			dwelling units.	
Credit 5: Housing and Jobs Proximity	1 to 3 Points	Encourage balanced communities with a diversity of uses and employment opportunities.	Locate and/or design the project such that the center is within a 1/2 mile walk distance of existing jobs.	**Criterion Not Met/Not Applicable.** The proposed residential development is not a mixed use project that provides employment opportunities for residents. Furthermore, the project is intended to accommodate retired adult residents. Therefore, this criterion is not applicable to the project.
Credit 6: Steep Slope Protection	1 Point	Minimize erosion to protect habitat and reduce stress on natural water systems by preserving steep slopes in a natural, vegetated state.	Locate on a site that has no existing slopes greater than 15%; OR on portions of previously developed sites with existing slopes greater than 15%, restore the slope area with native plants or non-invasive adapted plants.	**Criterion Partially Implemented.** Slopes along the western portion of the project site exceed a gradient of 15%, and some of these slopes would be graded for project development. New development, including a replacement Maintenance Building and parking lot, residential units 31-34 in the northwest corner of the project site, and residences on the Rutherford parcel would be located adjacent to previously developed portions of the project site, and disturbed slope areas would be landscaped using native and other appropriate plant species.

Table 7.2-1
Valle Verde Retirement Community Project
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Consistency Evaluation

Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
Credit 7: Site Design for Habitat or Wetland Conservation	1 Point	Conserve native plants, wildlife habitat, wetlands and water bodies.	Do not disturb significant habitat or portions of the site with an appropriate buffer around the habitat. Protect significant habitat and its identified buffers from development in perpetuity by donating or selling the land, or a conservation easement on the land.	**Criterion Partially Implemented.** Project-related construction and long-term fuel management activities will disturb oak woodland and coastal sage scrub habitat. These impacts would be reduced to a less than significant level through the implementation of proposed mitigation measures to provide replacement habitat on a 2:1 basis. The project would comply with the habitat conservation requirement of this criterion by restricting development potential on a 9.8 acre oak woodland area located on the western side of the project site.
Credit 8: Restoration of Habitat or Wetlands	1 Point	Restore native plants, wildlife habitat, wetlands and water bodies that have been harmed by previous human activities.	Using only native plants, restore predevelopment native ecological communities on the project site in an area equal to or greater than 10% of the development footprint.	**Criterion may be Implemented.** Most of the project site has been previously developed, and proposed development would result in the removal/disturbance of ornamental landscaping. However, on the western portion of the proposed development area, new structures would be provided in areas adjacent to native habitat such as coastal sage scrub and oak woodland; and non-native grassland. Some of this habitat has been degraded by previous fuel management activities

Table 7.2-1
Valle Verde Retirement Community Project
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
				that were conducted consistent with regulatory requirements and standard wildfire hazard risk reduction techniques (i.e, clearing or thinning vegetation a distance of 100 feet or more from structures). Based on a site-specific review of the project by the Santa Barbara Fire Department, the required fuel management zone has been reduced from 100 to 75 feet. This reduction would facilitate the restoration of previously fuel management areas. Such a restoration program could be implemented in conjunction with proposed mitigation measures that require the project to provide replacement coastal sage scrub and oak woodland habitat that would be impacted by construction and fuel management activities in areas adjacent to proposed structures.
Credit 9: Long-Term Conservation Management of Habitat or Wetlands and Water Bodies	1 Point	Conserve native plants, wildlife habitat, wetlands and water bodies.	Create and commit to implementing a long-term (at least ten-year) management plan for new or existing on-site native habitats, water bodies, and/or wetlands and their buffers.	**Criterion Partially Implemented.** The project would permanently dedicate or otherwise restrict development potential on a 9.8-acre oak woodland area. This project component would be consistent with the requirements of this criterion. Proposed mitigation measures

Table 7.2-1
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
				require the implementation of a restoration plan for impacted areas containing coastal sage scrub and oak woodland habitat. These mitigation measures require monitoring until the replacement habitat becomes self-sustaining (i.e., five years for oak woodland restoration). The proposed habitat restoration mitigation measures do not require the preparation of a ten-year maintenance plan.
Neighborhood Pattern and Design				
Prerequisite 1: Walkable Streets	na	Promote transportation efficiency and walking by providing safe, appealing and comfortable street environments that support public health by reducing pedestrian injuries and encouraging daily physical activity.	Comply with specified building entrance, building height, and street design requirements.	**Criterion Not Applicable.** The design measures specified by this criterion are for the design of a street system within a residential neighborhood. Due to the campus design of the Valle Verde facility, the residence and street design criteria are not applicable to the project. The existing and proposed project design would be consistent with the intent of this criterion to promote walking as a daily physical activity because the campus provides an extensive network of on-site pedestrian pathways.

Table 7.2-1
Valle Verde Retirement Community Project
LEED 2009 for Neighborhood Development (ND)
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
Prerequisite 2: Compact Development	na	Conserve land. Promote livability, transportation efficiency, and walkability.	Build any residential components of the project at a density of seven or more dwelling units per acre of buildable land available for residential uses.	**Criterion not Implemented.** The "net" project site area (excluding the 9.8-acre oak woodland dedication area) is 49.95 acres, and after the implementation of the proposed project, 257 units would be provided on the project site. This would result in a unit density of approximately 5.1 units per acre.
Prerequisite 3: Connected and Open Community	na	Promote projects that have high levels of internal connectivity and are well connected to the community at large.	Comply with specified street design requirements and encourage the use of public streets that are not gated.	**Criterion Not Applicable.** The design measures specified by this criterion are for the design of a street system within a residential neighborhood that is much larger in scale than the Valle Verde facility. The Valle Verde facility does include private streets, but they are not gated and public access is not precluded.
Credit 1:Walkable Streets	1 to 12 Points	Promote walking by providing safe, appealing and comfortable street environments that support public health by reducing pedestrian injuries	Comply with specified building entrance, building height, and street design requirements.	**Criterion Not Applicable.** The design measures specified by this criterion are for the design of a street system within a residential neighborhood. Due to the campus design of the Valle Verde facility, the residence and street design criteria are not applicable to the project. The existing and proposed project design would be consistent with the intent of this criterion to

Table 7.2-1
Valle Verde Retirement Community Project
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
				promote walking as a daily physical activity because the campus provides an extensive network of on-site pedestrian pathways.
Credit 2: Compact Development	1 to 6 Points	Conserve land. Promote livability, walkability, and transportation efficiency.	> 10 and ≤ 13 units/acre = 1 point > 13 and ≤ 18 units/acre = 2 points > 18 and ≤ 25 units/acre = 3 points > 24 and ≤ 38 units/acre = 4 points > 38 and ≤ 63 units/acre = 5 points > 63 units per acre = 6 points	**Criterion not Implemented.** The "net" project site area (excluding the 9.8-acre oak woodland dedication area) is 49.95 acres, and after the implementation of the proposed project, 257 units would be provided on the project site. This would result in a unit density of approximately 5.1 units per acre.
Credit 3: Mixed-Use Neighborhood Centers	1 to 4 Points	Cluster diverse land uses in accessible neighborhoods to encourage daily walking, biking and transit use.	Locate the project such that at least 50% of the dwelling units are within ¼ mile walk distance of a diverse range of uses. (1)	**Criterion Implemented.** The Valle Verde facility provides, and has proposed to provide, a variety of facilities and services that reduce vehicle trips by residents, such as recreation facilities, a limited-service bank branch, and dining opportunities. An MTD transit stop is located on the project site and Valle Verde operates a shuttle service for residents.
Credit 4: Mixed Income Diverse Communities	1 to 3 Points	Promote socially equitable and engaging communities by enabling residents from a wide range of economic levels, household sizes and age groups to live in a community.	The objective of this criterion is to provide a mix of housing types.	**Criterion not Implemented.** Due to the similarity of the residential units provided by the proposed project, points would not be awarded under this criterion. The proposed project is intended to

Table 7.2-1
Valle Verde Retirement Community Project
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
				serve a specific population segment (retirement-age adults) and is not intended to provide housing for a wide range of age groups.
Credit 5: Reduced Parking Footprint	1 Point	Design parking to increase the pedestrian orientation of projects and to minimize the adverse environmental effects of parking facilities.	For multifamily residential buildings, locate all off-street surface parking lots at the side or rear of buildings, leaving building frontages and streetscapes free of surface parking lots; and Use no more than 20% of the total development footprint area for surface parking facilities, with no individual surface parking lot larger than two acres.	**Criteria Partially Implemented.** New parking to be provided on the project site would be located primarily at locations adjacent to the adjoining street. Proposed parking and road areas would encompass 8.54 acres, which is approximately 17 percent of the "net" project area of 49.95 acres.
Credit 6: Street Network	1 to 2 Points	Encourage the design of projects that incorporate high levels of internal connectivity and the location of projects in existing communities in order to conserve land, promote multimodal transportation and promote public health through increased physical activity.	Comply with specified street design requirements.	**Criterion Not Applicable.** The design measures specified by this criterion are for the design of a street system within a residential neighborhood. Due to the campus setting of the Valle Verde facility, the street design criteria are not applicable to the project. The existing and proposed project design would be consistent with the intent of this criterion to promote walking as a daily physical activity because the campus provides an extensive network of on-site pedestrian pathways.

Table 7.2-1
Valle Verde Retirement Community Project
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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
Credit 7: Transit Facilities	1 Point	Encourage transit use and reduce driving by creating safe and comfortable transit facilities.	Provide transit stop locations within and/or bordering the project boundary.	**Criterion Implemented.** The Valle Verde facility is presently served by an MTD bus stop.
Credit 8: Transportation Demand Management	1 to 2 Points	Reduce energy consumption and pollution from motor vehicles by encouraging use of public transit.	Create and implement a comprehensive transportation demand management (TDM) program for the project aimed at reducing weekday peak period trips by at least 20% compared to the forecasted trip generation for the project without the TDM strategies; and fund for a minimum of three years following buildout of the project	**Criterion Not Applicable.** The proposed project would generate eight (8) a.m. peak hour trips and 12 p.m. peak hour trips. Due to the very small number of peak hour trips generated by the project, the implementation of a TDM program is not warranted.
Credit 9: Access to Civic and Public Spaces	1 Point	Provide a variety of open spaces close to work and home to facilitate social networking, civic engagement, physical activity and time spent outdoors.	Locate and/or design projects so that passive use space, such as a square, park, paseo or plaza, at least 1/6 acre in area, is located within a 1/4 –mile walk of 90% of planned and existing dwelling units.	**Criterion Implemented.** Existing and proposed residences on the Valle Verde campus have access to a variety of passive open space areas that are distributed throughout the project site.
Credit 10: Access to Recreation Facilities	1 Point	Provide a variety of recreation facilities close to home to facilitate physical activity and social networking.	Locate and/or design the project so that a publicly accessible outdoor recreation facility at least one acre in area, or a publicly accessible indoor recreation facility of at least 25,000 square feet, lies within a 1/2–mile walk of 90% of new and existing dwelling units.	**Criterion Implemented.** The Valle Verde facility provides a wide variety of indoor and outdoor recreation facilities available to residents.
Credit 11: Visitability and Universal Design	1 Point	Enable the widest spectrum of people, regardless of age or ability, to more easily participate in their community	Throughout new homes, include the following types of accessibility features:	**Criterion Implemented.** Proposed units would be designed specifically for retired adults and would include

Table 7.2-1
Valle Verde Retirement Community Project
LEED 2009 for Neighborhood Development (ND)
Consistency Evaluation

Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
		life by increasing the proportion of areas that are usable by people of diverse abilities.	• Easy-to-grip lever door handles. • Easy-to-grip cabinet and drawer loop handles. • Motion-detector lighting. • Minimum 32-inch door openings • Interior floor surfaces that provide easy passage for a wheelchair or walker.	the types of design features identified by this criterion.
Credit 12: Community Outreach and Involvement	1 to 2 Points	Encourage community participation in the project design and planning and involve the people who live in a community in deciding how it should be improved or how it should change over time.	Meet with adjacent residents and local public officials to solicit input on the proposed project during the pre-conceptual design phase, and Host an open community meeting during conceptual design phase to solicit input on the proposed project, and Modify the project design as a direct result of community input, or if modifications are not made, explain why community input did not generate design improvements.	**Criterion Implemented.** A public hearing was conducted by the City prior to the start of the environmental review process to obtain comments from interested parties regarding the proposed project. Additional hearings regarding the proposed project will be conducted that will facilitate public input regarding the proposed project.
Credit 13: Local Food Production	1 Point	Promote community-based and local food production to minimize the environmental impacts from	Establish CC&Rs or other forms of deed restrictions that do not prohibit areas for growing produce, including	**Criterion may be Implemented.** The project could allow gardens to be established on patios, balconies,

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Criterion	Possible Points	Intent	Requirements	Consistency Evaluation
		transporting food long distances and increase direct access to fresh foods.	greenhouses, on any portion or area of residential front yards, rear yards, side yards, balconies, patios or rooftops. Greenhouses, but not gardens, may be prohibited in front yard areas that face the street.	etc. The design of the proposed project would not facilitate the implementation of large-scale facilities such as greenhouses. Valle Verde has implemented food buying programs the emphasize purchasing produce from local sources.
Credit 14: Tree-Lined and Shaded Streets	1 to 2 Points	Encourage walking, bicycling, and transit use and discourage excessive motoring speeds, reduce urban heat island effects, improve air quality, increase evapotranspiration and reduce cooling loads in buildings.	Provide street trees on both sides of at least 60% of new and existing streets.	**Criterion Implemented.** Consistent with the requirements of this criterion, the proposed project would provide trees adjacent to streets, parking lots and buildings.
Credit 15: Neighborhood Schools	1 Point	Promote community interaction and engagement by integrating schools into the neighborhood.	Locate or design the project so that at least 50% of the project's dwelling units are within ½ mile walk distance of an existing or planned school.	**Criterion Not Applicable.** Valle Verde is a community for retired adults and school-aged children do not reside on the project site.

(1) List of Diverse Uses

Bank
Child care facility (licensed)
Community/civic center
Convenience store
Hair care
Hardware store
Health club or outdoor recreation facility
Laundry/dry cleaner
Library
Medical/dental office
Pharmacy (stand-alone)
Health club or outdoor recreation facility
Laundry/dry cleaner
Place of worship
Police/fire station
Post office
Restaurant
School
Senior care facility
Supermarket
Theater

Sustainability Evaluation Conclusion

Energy used to construct the Valle Verde project would not be excessive and mitigation measures identified by the Initial Study prepared for the project would further reduce project-related short-term energy demands. The Valle Verde facility uses photo-voltaic and solar heating systems, further reducing its energy consumption requirements. By providing services on the project site such as dining, banking and recreation opportunities, additional energy savings are realized by reducing vehicle trips off of the project site. Based on these design characteristics, the project would not result in inefficient, wasteful or unnecessary energy use.

The Valle Verde project would implement a variety of smart growth development principles, including the use of a previously developed site in an infill setting; providing residential development in proximity to existing utilities, urban services, streets, transit, and recreation facilities; minimizing habitat-related impacts; and providing a design that encourages walking and social interaction. The project would partially implement smart growth-related objectives related to avoidance of steep slopes and habitat restoration. Smart growth objectives that would not be implemented by the project generally apply to street system design that are not applicable to the campus setting of the Valle Verde facility. Overall, the proposed project would implement all of the smart-growth criteria that are considered prerequisites by the LEED-ND program, and would also implement or at least be partially consistent with most of the smart growth evaluation criteria prescribed by the LEED-ND program. Therefore, the Valle Verde project should be considered to be consistent with the City's sustainable development objectives related to energy use and the design of new development.